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be liable to prosecution for misdemeanor and punishment by imprisonment. This law was enacted principally to constitute a weapon to compel especially negro farm laborers to perform the service required by their contracts of employment on pain of being sent to jail or being made members of the chain-gang. The United States District Court for the District of South Carolina in *Ex parte Drayton*, 153 Federal Reporter, 986, holds this law unconstitutional, as violating the thirteenth and fourteenth amendments of the federal Constitution, and as not being a valid exercise of the police power of the state.

Draftsman as Fellow Servant with Elevator Man.—The New York Supreme Court in *Fouquet v. New York Central & Hudson River Ry. Co.*, 103 New York Supplement, 1105, held that a draftsman in the employ of the engineering department of the New York Central Railroad was a fellow servant with a man running the elevator in the Grand Central Depot in New York, in which the draftsman worked.

Validity of Labor Law.—The validity of the New York law prohibiting the employment of females, regardless of age, in factories between 9 o'clock p. m. and 6 o'clock a. m., came up for final determination by the state courts in *People v. Williams*, 81 Northeastern Reporter, 778. The Court of Special Sessions of the First Division of the City of New York (100 New York Supplement, 377) held the law unconstitutional as infringing the constitutional right to contract. This decision was affirmed by the Appellate Division by a divided court (101 New York Supplement, 562, 116 App. Div. 379). The Court of Appeals now affirms the decision of the court below, and holds the law unconstitutional on the same grounds as the Court of Special Sessions. The court says that the courts have gone very far in upholding legislative enactments framed clearly for the welfare, comfort, and health of the community; but when it is sought, as here, arbitrarily to prevent an adult female citizen from working at any time of the day that suits her, it is time to call a halt. Such a law arbitrarily deprives citizens of their right to contract with each other.

Use of Public Streets by Interurban Railroads.—The extensive development of interurban railroads is gradually narrowing the distinction between the right of commercial railroads, or so-called steam railroads, and street railroads proper, as interurban roads in many instances partake of the nature of both. In *Kinsey v. Union Traction Company*, 81 Northeastern Reporter, 922, decided by the Indiana Supreme Court, one of the main contentions was whether or not interurban cars, operated on the streets of a city with its permission, for the carriage of passengers, express, and light freight by a corporation unorganized under the street railway laws, constituted an